

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DANIEL ANDERSEN,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 16 CV 1963
)	
CITY OF CHICAGO, et al.,)	Judge Virginia M. Kendall
)	
Defendants.)	Magistrate Judge Sunil Harjani

**MOTION FOR LEAVE TO FILE A TRANSCRIPT OF A SEALED HEARING AS AN
EXHIBIT IN SUPPORT OF DEFENDANTS' RESPONSE TO PLAINTIFF'S MOTION
TO PRESENT 404(B) EVIDENCE (Dckt. No. 745)**

NOW COME Defendants, JAMES BEDNARKIEWICZ, RICHARD BEDRAN, JAMES HIGGINS, DANIEL MCWEENY, PAUL NIELSEN, JOHN OLSON and MICHAEL RILEY(collectively "Defendant Officers"), by and through their attorneys, of BORKAN & SCAHILL, LTD., and submit this Motion for Leave to File Under Seal. In support thereof, Defendants state:

1. Defendants filed a motion to bar bad actions against the Defendant Officers. Dckt. No. 503.
2. This Court requested Plaintiff submit a "404(b) motion seeking specific instances of conduct and how those instances of conduct will be presented to the Jury in order for the Court to determine if they should be present." Dckt. No. 687.
3. Defendants request leave to file a transcript of a sealed hearing as an exhibit in support of Defendants' Response To Plaintiff's Motion to Present 404(b) Evidence under seal.
4. The transcript of the sealed hearing involves reference to sensitive subjects that have previously been filed under seal. See Dkt. 760, 769.

WHEREFORE, Defendants respectfully request that this Court allow them leave to file a Transcript of a Sealed Hearing As an Exhibit In Support of Defendants' Response to Plaintiff's Motion to Present 404(b) Evidence.

Respectfully submitted,

BORKAN & SCAHILL, LTD.

By: /s/ Timothy P. Scahill
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